

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA**

**TRANS ENERGY, INC., a Nevada  
Corporation; REPUBLIC PARTNERS  
VI, LP, a Texas limited partnership;  
REPUBLIC ENERGY VENTURES, LLC,  
a Delaware Limited Liability Company; and  
PRIMA OIL COMPANY, INC., a Delaware  
Corporation,**

**Plaintiffs,**

**v.**

**CIVIL ACTION NO. 1:11-cv-00075**

**EQT PRODUCTION COMPANY, a Pennsylvania  
Corporation,**

**Defendant.**

**EQUITABLE PRODUCTION COMPANY'S MOTION TO EXTEND DISCOVERY AND  
DEFER CONSIDERATION OF PLAINTIFFS' ANTICIPATED MOTION FOR  
SUMMARY JUDGMENT**

Defendant Equitable Production Company ("EPC") by and through its undersigned counsel, Richard L. Gottlieb, Esquire, Ramonda C. Lyons, Esquire, and Lewis Glasser Casey & Rollins PLLC, hereby moves this Honorable Court to extend the time period for discovery and to defer consideration of Plaintiffs' anticipated Motion for Summary Judgment pursuant to Rules 37 and 56(d) of the Federal Rules of Civil Procedure. For the reasons more fully developed in the contemporaneously filed memorandum of law in support of this motion, the procedural posture of this matter warrants extension of the time period for discovery and deferral of the Court's consideration of Plaintiffs' anticipated motion for summary judgment. EPC attempted to resolve the issues raised in this motion with Plaintiffs' counsel as part of the meet and confer, but the parties were unable to reach agreement and judicial intervention is necessary at this juncture.

Equitable Production Company

*By Counsel*

LEWIS GLASSER CASEY & ROLLINS PLLC

/s/ Ramonda C. Lyons

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**CERTIFICATE OF SERVICE**

I, Ramonda C. Lyons, hereby certify that on the 4<sup>th</sup> day of September, 2012, I electronically filed *Equitable Production Company's Motion to Extend Discovery and Defer Consideration of Plaintiffs' Anticipated Motion for Summary Judgment* with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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